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White Plains, NY Atlantic City, NJ

January 22, 2024

Via Electronic Case Filing

The Honorable Vincent L. Briccetti United States District Court Southern District of New York United States Courthouse 300 Quarropas Street, Courtroom 630 White Plains, New York 10601

Re: White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v. The

County of Westchester, Case No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

Counsel for plaintiff White Plains Aviation Partners, LLC, d/b/a Million Air White Plains ("Million Air"), and counsel for defendant the County of Westchester (the "County"), respectfully submit this joint request for a one-week extension of time, from January 22, 2024, until January 29, 2024, to file a joint status update.

Pursuant to the Court's Order, dated November 20, 2023, the Court continued the stay of all discovery deadlines in this action, and ordered the parties to submit, by January 22, 2024, a joint status update as to their ongoing discussions and actions concerning a number of the material issues in the above-referenced matter. As part of that process, the parties were scheduled to meet on January 23, 2024, along with representatives from the Federal Aviation Administration. However, late last week the County informed Million Air that it had to cancel that meeting, and the parties currently are in the process of discussing next steps in this matter, including a suggestion by the County to meet on February 15, 2024, without the Federal Aviation Administration. The parties currently disagree as to whether the Federal Aviation Administration should attend the meeting. Accordingly, the parties request a one-week extension of time to submit a status report.

This is the parties' first request for an extension of the deadline to submit a joint status report. The parties thank the Court for its consideration of their request.

Respectfully submitted,

YANKWITT LLP Counsel for Plaintiff Million Air

By: _/s/ Russell M. Yankwitt Russell M. Yankwitt Ross E. Morrison Jonathan Ohring Hon. Vincent L. Briccetti January 22, 2024 Page 2 of 2



JOHN M. NONNA Westchester County Attorney Counsel for Defendant County of Westchester

By: _/s/John M. Nonna John M. Nonna Shawna Macleod Sean Carey